

EXHIBIT 13

1 J. PETRONIO

2 UNITED STATES DISTRICT COURT

3 FOR THE DISTRICT OF MASSACHUSETTS

4
5 PEGASYSTEMS INC.

6 Plaintiff

7
8 V.

Case No.

9 1:2019cv11461

10 APPIAN CORPORATION AND BUSINESS

11 PROCESS MANAGEMENT, INC.

12 Defendants

13 _____/

14
15
16 REMOTE VIDEOTAPED DEPOSITION OF

17 JOHN PETRONIO

18 Boston, Massachusetts

19 Thursday, July 1, 2021

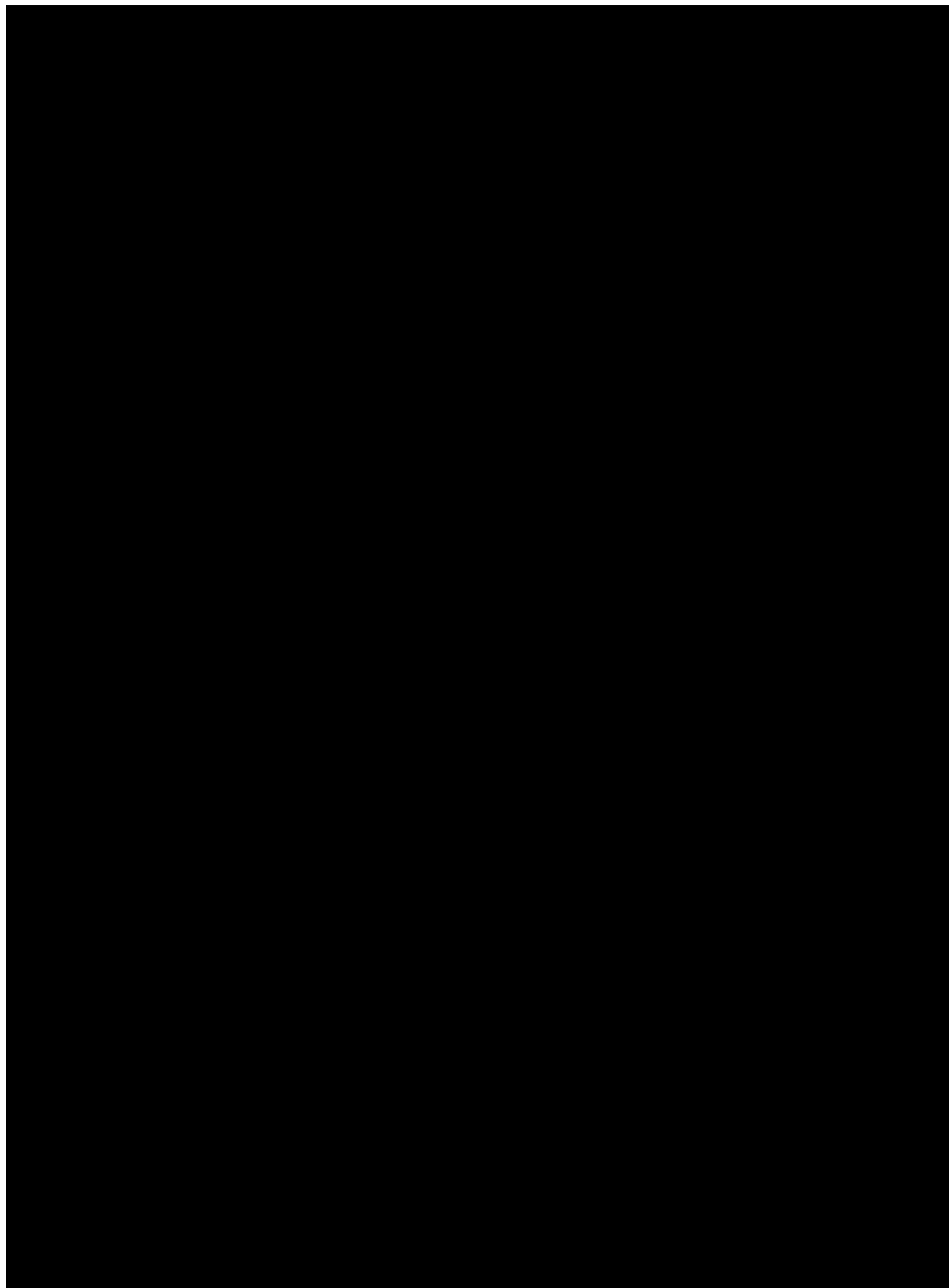
20
21
22 Reported by:

23 Deborah Roth, RPR-CSR

24 Job No. 196451

J. PETRONIO

start again.



Let's see. What else is there?

I'm sorry. I'm getting tired. It's a

1 J. PETRONIO

2 long day.

3 Can I take a second to think
4 about this? Maybe, can we take a
5 five-minute break and walk around?

6 Q. Yeah.

7 A. That would be helpful.

8 MR. MANGI: That's fine. Let's
9 do five minutes.

10 THE VIDEOGRAPHER: This is the
11 end of media unit number four. Off
12 the record, 4:42 p.m.

13 (A recess was taken.)

14 THE VIDEOGRAPHER: This is the
15 beginning of media unit number five.
16 On the record, 4:51 p.m.

17 BY MR. MANGI:

18 Q. Mr. Petronio, before the break I had
19 asked are there instances you're aware of
20 where Pega used reports, analyses, white
21 papers or other documents that it had
22 commissioned or paid for in the
23 marketplace without disclosing that it
24 had paid for it?

25 MR. HORVATH: I object to the

1 J. PETRONIO

2 form.

3 A. Yes. I'm having trouble recalling
4 anything but the Sinur report. So I
5 don't -- I don't think so.

6 Q. Okay. Let me show you -- you
7 mentioned a report about JAVA. Let me
8 show what I think is that report which is
9 a report from Capgemini. Let me put that
10 up.

11 MR. MANGI: This is going to
12 be, let's see, I think this is going
13 to be Exhibit 32 to your deposition.

14 (Exhibit 32 was marked for
15 identification.)

16 MR. MANGI: And let's go down a
17 little bit and just let Mr. Petronio
18 have a look at -- why don't you show
19 Mr. Petronio "about the study page."
20 Yeah.

21 A. Does it say anything about Kanbay
22 here?

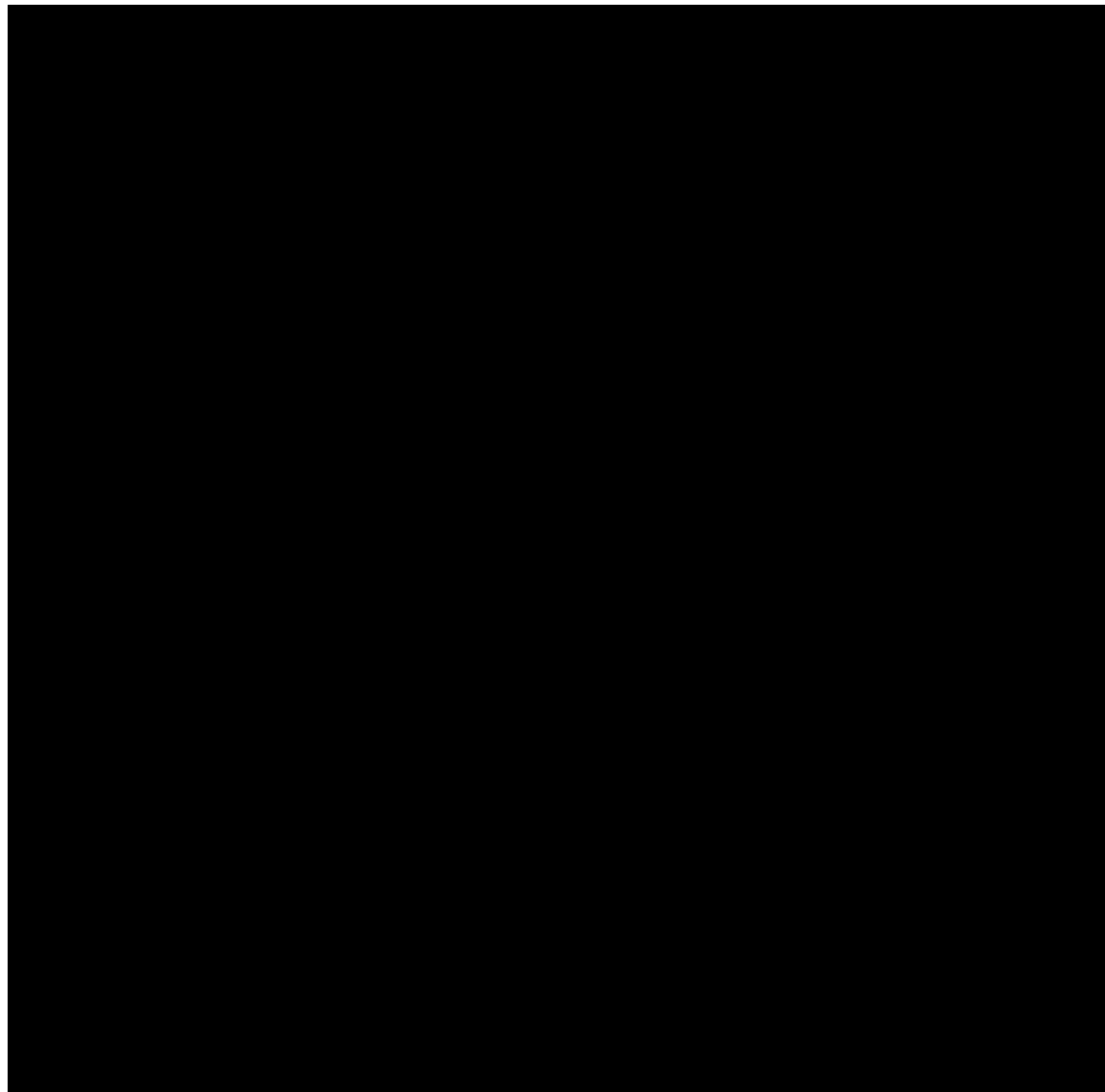
23 Q. Is it possible that Kanbay was a
24 predecessor to Capgemini? Is that
25 stirring any memories for you?

1 J. PETRONIO

2 A. It was a small company that
3 Capgemini acquired, and it was a
4 work-for-hire originally.

5 Q. Okay. So is this document, Exhibit
6 32, a document that you were thinking
7 about when you started answering my
8 question before the break?

9 A. Yes.



J. PETRONIO

[REDACTED]

MR. HORVATH: I object to the
form.

[REDACTED]

J. PETRONIO

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